

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOUREY NEWELL, *individually and on
behalf of all persons and entities similarly
situated*,

Plaintiff,

v.

CASE NO. 2:25-cv-01018-GJP

LENDVIA LLC

Defendant.

DEFENDANT LENDVIA LLC’S MOTION TO BIFURCATE DISCOVERY

Defendant LendVia LLC (“LendVia”), by and through its undersigned counsel, respectfully moves this Court for entry of an Order phasing discovery in this matter pursuant to Federal Rule of Civil Procedure 42(b). As set forth in the accompanying Memorandum, in order to effectively manage this litigation, conserve party and judicial resources, and resolve factual disputes as to the merits of Plaintiff Jourey Newell’s individual claims, discovery should be conducted in three separate phases: (1) discovery into Plaintiff’s individual claims, (2) discovery into the appropriateness of class certification if Plaintiff’s claims proceed, and (3) if a class is ultimately certified, merits discovery for the class. Pursuant to Local Rule 7.1 (a)-(c), LendVia submits the attached Memorandum of Law and proposed form of Order.

WHEREFORE, LendVia respectfully requests that this Court grant the Motion and enter the proposed form of Order.

Dated: April 23, 2025

Respectfully submitted,

/s/Corey M. Scher

Corey M. Scher, Esquire (Pa Bar # 326838)
Fox Rothschild LLP

-and-

Jenniffer Cabrera (*pro hac vice pending*)
Troutman Amin LLP

Attorneys for Defendant LendVia LLC